

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
THOMAS LONG, III AND NAKITA T. LONG :
: CASE NO.: 16-01851
Debtors. :

FLAGSHIP CREDIT ACCEPTANCE, :
:
Movant. :
and :
:
THOMAS LONG, III AND NAKITA T. LONG, :
:
Respondents. :

STIPULATION IN SETTLEMENT OF MOVANT’S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Branch Banking and Trust Company, successor by merger to
Susquehanna Bank (“Movant”), by and through its attorneys, JSDC Law Offices, and the
Debtors, Thomas Long, III and Nakita T. Long, by and through their attorney, Paul Donald
Murphy-Ahles, Esquire, and files this Stipulation in Settlement of Movant’s Motion for Relief
from the Automatic Stay as follows:

WHEREAS, Debtor filed a voluntary petition for relief under Chapter 13 of the
Bankruptcy Code on April 29, 2016; and

WHEREAS, Movant filed a Motion for Relief from the Automatic Stay (“Motion for
Relief”), with respect to Debtors’ 2008 Audi automobile with a Vehicle Identification Number of
WAUDH74F08N130857 (“Vehicle”) alleging that Debtors are in default under the terms of the
Agreement and Chapter 13 Plan for their failure to make post-petition payments when due; and

WHEREAS, Movant and Debtors wish to resolve and settle the issues raised in Movant’s
Motion for Relief pursuant to the terms and conditions set forth in this Stipulation.

NOW, THEREFORE, in consideration of the above recitals and intending to be legally bound hereby, Movant and Debtor through their duly authorized counsel, hereby agree as follows:

1. Debtor hereby acknowledges and agrees that the total amount past due to Movant as of April 4, 2019 is \$1,623.40 (“Arrearages”).

2. Debtor agrees to cure the Arrearages over six (6) months by making an additional payment of \$270.56, along with their regular contractual monthly post-petition payment, commencing with the April 2019 post-petition payment and continuing each month thereafter, until the Arrearages are paid in full. Upon payment in full of the Arrearages, Debtors will continue to make their post-petition payments on time and in full for the duration of the above-captioned bankruptcy.

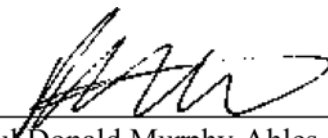
3. Should Debtors fail to make the aforesaid payments set forth in Paragraph 2 hereof within ten (10) days of the due date, Movant will send written notice of said default to Debtors and Debtors’ counsel with said notice being sent to Debtors’ counsel via e-mail. Should Debtors fail to cure the default within ten (10) days of the date of the notice, Movant will be granted relief from the automatic stay upon the filing of a Certificate of Default by counsel for Movant and without the necessity of further Order of this Court.

4. Movant and Debtor request Court approval of this Stipulation by execution of the attached Order.


IN WITNESS WHEREOF, Movant and Debtor, by and through their respective counsels,
execute this Stipulation this 30th day of April, 2019.

JSDC Law Offices

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I do not object to the foregoing Stipulation


for Charles J. DeHart, III
Chapter 13 Trustee